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**From:** Rose Kachadoorian [rkachadoorian@oda.state.or.us]  
**Sent:** 10/28/2020 12:05:24 AM  
**To:** GBahr@agr.wa.gov  
**CC:** Reed, Leo A [reedla@purdue.edu]; Leach, Carrie A [leach13@purdue.edu]; Jeffrey Rogers [jeffrey.rogers@vdacs.virginia.gov]; aapco.sfireg [aapco.sfireg@gmail.com]; Liza Fleeson [Liza.Fleeson@vdacs.virginia.gov]; Picone, Kaitlin [Picone.Kaitlin@epa.gov]; O'Neill, Sandra [ONeill.Sandra@epa.gov]  
**Subject:** Re: SFIREG Issue Paper: Pesticide contaminants - Signed EPA Response letter

I wrote the issue paper and Oregon has been working with EPA. Gary, do you want to talk?

Rose Kachadoorian  
Oregon

On Oct 27, 2020, at 4:09 PM, O'Neill, Sandra <ONeill.Sandra@epa.gov> wrote:

Hi Leo and Gary,

While I can't speak to what AAPCO/SFIREG was seeking in the issue paper, I can confirm that OPP is providing lab support for product testing and OECA and OGC weighed in to provide that they believe enforcement actions under FIFRA can be taken, depending on the facts of each case. I know those are pretty broad statements, but to the extent there's any state info. on investigations for organic products, what actions have been taken, we can pass this info. to OECA so they can include in the information they have and use for the position on enforceability and PRN 96-8.

I noted Gary's comment that this may be a topic in the upcoming SFIREG meeting. If so, I can begin reaching out to OECA to identify folks who can speak to this issue.

Thanks, and a good night to all,

Sandra O'Neill  
919-323-7926

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**From:** Bahr, Gary (AGR) <GBahr@agr.wa.gov>  
**Sent:** Tuesday, October 27, 2020 5:40 PM  
**To:** Reed, Leo A <reedla@purdue.edu>  
**Cc:** O'Neill, Sandra <ONeill.Sandra@epa.gov>; Leach, Carrie A <leach13@purdue.edu>; Jeffrey Rogers <jeffrey.rogers@vdacs.virginia.gov>; aapco.sfireg <aapco.sfireg@gmail.com>; Rose Kachadoorian <rkachadoorian@oda.state.or.us>; Liza Fleeson <Liza.Fleeson@vdacs.virginia.gov>  
**Subject:** RE: SFIREG Issue Paper: Pesticide contaminants - Signed EPA Response letter

Leo,

EPA is giving AAPCO/SFIREG an answer that says, *"EPA does not believe PRN 96-8 poses vulnerabilities"*, but in the interim EPA can provide states the opportunity to send samples and/or product into their lab in MD to be tested at no cost.

- *"In the near term, EPA proposes to support the states and better understand the scope of the issue by providing laboratory support for testing of pesticide products with suspected high levels of impurities through the Office of Pesticide Programs' (OPP) Biological and Economic Analysis Division's (BEAD) Analytical Chemistry Branch*

*Laboratory in Fort Meade, MD. Additional work may also be explored over a longer period, as new information comes to light. EPA responses to specific topics raised in the issue paper are provided in the following sections."*

- "While this position is based on an analysis of FIFRA and not any particular state law, we believe the states may still find it useful to know that EPA does not believe PRN 96-8 poses vulnerabilities to its own enforcement in this area."

Basically it says the 1990's PRN 96-8 is currently not a problem, and "let's keep the lines of communication open".

We have our Full SFIREG meeting coming up and we can add this to the agenda. I don't think it's necessary to respond to EPA and Ed with another letter at this point.

Thanks,

Gary

Gary Bahr  
SFIREG Chair  
Section Manager  
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**From:** Reed, Leo A <[reedla@purdue.edu](mailto:reedla@purdue.edu)>  
**Sent:** Tuesday, October 27, 2020 12:27 PM  
**To:** O'Neill, Sandra <[O'Neill.Sandra@epa.gov](mailto:O'Neill.Sandra@epa.gov)>; Bahr, Gary (AGR) <[GBahr@agr.wa.gov](mailto:GBahr@agr.wa.gov)>; Leach, Carrie A <[leach13@purdue.edu](mailto:leach13@purdue.edu)>; Jeffrey Rogers <[jeffrey.rogers@vdacs.virginia.gov](mailto:jeffrey.rogers@vdacs.virginia.gov)>; aapco.sfireg <[aapco.sfireg@gmail.com](mailto:aapco.sfireg@gmail.com)>; Rose Kachadoorian <[rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)>; Liza Fleeson <[Liza.Fleeson@vdacs.virginia.gov](mailto:Liza.Fleeson@vdacs.virginia.gov)>  
**Subject:** RE: SFIREG Issue Paper: Pesticide contaminants - Signed EPA Response letter

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Give me some insight, please.

Is laboratory support "where contamination is suspected" what we were looking for?

Seems like state labs had been running and finding the contaminants and we were looking for federal enforcement.

Please set me straight.

Leo

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**From:** O'Neill, Sandra <[O'Neill.Sandra@epa.gov](mailto:O'Neill.Sandra@epa.gov)>  
**Sent:** Thursday, October 15, 2020 4:04 PM  
**To:** Reed, Leo A <[reedla@purdue.edu](mailto:reedla@purdue.edu)>; GBahr@agr.wa.gov; Leach, Carrie A <[leach13@purdue.edu](mailto:leach13@purdue.edu)>; Jeffrey Rogers <[jeffrey.rogers@vdacs.virginia.gov](mailto:jeffrey.rogers@vdacs.virginia.gov)>; aapco.sfireg <[aapco.sfireg@gmail.com](mailto:aapco.sfireg@gmail.com)>; Rose Kachadoorian <[rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)>; Liza Fleeson <[Liza.Fleeson@vdacs.virginia.gov](mailto:Liza.Fleeson@vdacs.virginia.gov)>  
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<Wait.Monica@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Hopkins, Yvette <Hopkins.Yvette@epa.gov>

**Subject:** SFIREG Issue Paper: Pesticide contaminants - Signed EPA Response letter

Greetings AAPCO and SFIREG leaders,

As mentioned on our AAPCO/SFIREG & EPA call today, Ed Messina has signed EPA's letter responding to SFIREG's Pesticide Impurities issue paper. The signed letter is attached.

Many thanks for engaging with EPA on discussions on this issue paper. You'll note we have some follow-up steps, such as laboratory testing offered in the letter, but are happy to provide the EPA response letter today.

Please let me know if you have any follow-up questions.

Kind regards,

Sandra O'Neill

Government Liaison & SFIREG Project Officer

Intergovernmental & Community Relations Branch

Mission Support Division || Office of Program Support/OCSP || U.S. EPA || 919-323-7926